REMARKS

Claims 1-14, 16, and 18-21 were presented for examination and were pending in this application. In an Office action dated December 7, 2007, claims 1-14, 16, and 18-21 were rejected. Applicants have amended claims 1, 10, and 20 and now respectfully request consideration of the application in view of the above amendment and following remarks.

Claim Objections

Examiner has objected to claim 20 because of informalities. Applicant has amended claim 20 accordingly. Thus, Applicant respectfully submits that all informalities with respect to claim 20 have been resolved. Hence, withdrawal of this objection is respectfully requested.

Claim Rejections - 35 USC § 112

The Examiner has rejected claims 16 and 18-21 under 35 USC § 112, ¶ 2 as allegedly not specifically pointing out and distinctly claiming the subject matter that the Applicants regard as their invention.

Applicants have amended claim 20 to correct the informalities noted by Examiner. These amendments are made so as to more clearly define the invention, and not to narrow the scope of protection provided by the claims. Based on these amendments, Applicants kindly request withdrawal of these rejections and allowance of claim 20. As claims 16, 18, 19, and 21 depend from claim 20, these amendments also correct the informalities of claims 16, 18, 19, and 21. Hence, Applicants kindly request withdrawal of these rejections and allowance of claims 16, 18, 19, and 21.

Claim Rejections - 35 USC § 103

In the 11th paragraph of the Office Action, Examiner rejects claims 1, 3-10, 12-14, 16 and

18-21 under 35 USC § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,912,707 to

Fontes, Jr. ("Fontes"), in view of U.S. Patent No. 6,226,652 to Percival et al. ("Percival"). This

rejection now is respectfully overcome in view of the amended claims.

Claim 1, as amended, recites:

> A method of merging first and second text files wherein the first and
> second text files are modified versions of a common text file, the method
> comprising the steps of:
>
> producing a first set of stacked diffs between the first text file and the
> common text file;
>
> producing a second set of stacked diffs between the second text file and
> the common text file;
>
> simultaneously displaying the first and second sets of stacked diffs,
> wherein common lines of text included in the first and second sets of
> stacked diffs are aligned and new lines of text included in each of the first
> and second sets of stacked diffs are aligned with blank lines of the other
> stacked diff;
>
> merging the first text file and the second text file to produce a merged
> result; and
>
> providing to a user a conflict resolution pane which accepts user-generated
> textual modifications to the merged result. (emphasis added)

Thus, amended claim 1 recites, *inter alia*, "a conflict resolution pane which accepts user-

generated textual modifications to the merged result." Once the first text file and the second text

file are merged to produce a merged result, the merged result is displayed in the conflict

resolution pane for inspection by a user. Should the user desire to modify the merged result, the

conflict resolution pane receives user generated textual modifications to allow the user to

directly modify the merged result without constraining the type of modifications the user may

make. Hence, text deleted from or added to the merged result is at the discretion of the user and is not limited to a predefined set of modifications. Thus, the conflict resolution pane beneficially simplifies modification of the merged result and allows modification of the merged result without constraint based on user-generated modifications received by the conflict resolution pane.

Fontes fails to disclose at least the feature of "a conflict resolution pane which accepts user-generated textual modifications to the merged result." Fontes merely discloses a system in which a user may accept or reject modifications already present in a more recent version of a file. Specifically, Fontes provides:

> If the user wants the final version 304 to look like the base drawing 300, the user would click the mouse 112 on button 910, which would revert revision 302 to base drawing 300 for this difference only. If the user wants the final drawing to look like the revision 302, the user can select the next button 914 to go to the next change.

Fontes, col. 6, lines 1-5. Thus, in Fontes, the modifications available to a user are restricted to a predefined set of modifications proposed by the system, no "user-generated textual" modifications are permitted so no "conflict resolution pane" accepts "user-generated textual modifications. A user in Fontes may only choose to "revert" or choose not to "revert" to a previous version of the file. Fontes, Figure 9. This approach is problematic if neither the "base drawing 300" nor the "revision 302" are as desired by the user. In such scenarios, the user is unable to introduce "user-generated" modifications to directly modify a merged result of the first text file and second text file as desired. As described by Fontes, "In merge mode, the assumption is that all data changes in revision 302 are correct." Fontes, col. 4, lines 39-41. Hence, Fontes does not allow a user to merge a first text file and a second text file then to modify the merged result by merely providing textual modifications to a conflict resolution pane, but

merely permits a user to select between two versions of a file. Hence, there is no "conflict resolution pane which accept user-generated textual modifications to the merged result," disclosed in Fontes, but merely a disclosure of user selection of an already modified version of a graphical file.

Percival fails to remedy the deficient disclosure of Fontes. Further, Percival is cited merely to show the existence of "text files and lines of text." Office Action dated December 7, 2007, p. 5 ("Office Action"). Like Fontes, Percival describes a system in which a user may modify a file, only by choosing between different, previously modified, versions of the file. Specifically, "The user may then resolve any differences between the various versions by visually selecting a preferred one of the versions." Percival, col. 1, lines 47-49. Thus, in Percival, the modifications available to a user are restricted to those proposed by the system, no "user-generated" modifications to a merged result generated from merging a first text file and a second text file is modified via a conflict resolution pane. At most, Percival describes an "Edit button 344" which merely "allows the user to edit a selected line" in one of the files being merged, referred to in Percival as "the Merge Target," and to use this edited file in the subsequent merge through a "Use Merge target' button 346," which "becomes active when all differences have been resolved." Percival, col. 5, lines 1-3; FIG. 3. Hence, in Percival a user is not able to modify the results of a merge, but must edit one of the files used in the merge, then perform a second merge that includes the edited file, so Percival is unable to introduce user-generated modifications into a merged result using a conflict resolution pane. Rather, Percival also limits options available to a user for making modifications to selecting between already modified versions of the files to be merged. There is no "conflict resolution pane which accepts

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user-generated textual modifications to the merged result" disclosed in Percival, so users cannot introduce user-generated modifications directly into the merged result.

Applicants can find no disclosure or suggestion in Fontes or Percival, alone or in combination, of "a conflict resolution pane which accepts user-generated textual modifications to the merged result" as claimed. Applicants respectfully submit that for at least these reasons, claim 1 is patentably distinguishable over the cited references, both alone and in combination. Therefore, Applicants respectfully request that Examiner withdraw this rejection.

As claims 3-10 and 12-14 variously depend from claim 1, all arguments advanced above are hereby incorporated so as to apply to claims 3-10 and 12-14. Therefore, Applicants respectfully submit that claims 3-10 and 12-14 are patentable over the cited references, both alone and in combination, and respectfully request withdrawal of this rejection.

Independent claim 20 has been amended to recite elements similar to claim 1, specifically:

> …. providing to a user a conflict resolution pane which accepts user-generated textual modifications to the merged result.

Thus, all arguments advanced above with respect to claim 1 also apply to amended claim 20. Hence, claim 20, as amended, is patentably distinguishable over the cited references, both alone and in combination. Therefore, Applicants respectfully request that Examiner withdraw this rejection.

As claims 16, 18, 19, and 21 variously depend from claim 20, all arguments advanced above with respect to claim 20 are hereby incorporated so as to apply to claims 16, 18, 19, and 21. Therefore, Applicants respectfully submit that claims 16, 18, 19, and 21 are patentable over

the cited references, both alone and in combination, and respectfully request withdrawal of this rejection.

In the 12th paragraph of the Office Action, Examiner rejects claim 2 under 35 USC § 103(a) as allegedly being unpatentable over Fontes in view of Percival in further view of U.S. Patent 6,275,223 B1 to Hughes ("Hughes"). This rejection now is overcome in view of the amended claims.

As claim 2 depends from claim 1, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claim 2.

Hughes fails to remedy deficient disclosure of Fontes and Percival. Rather, Hughes is cited merely to show two files being scrolled together. Hughes describes a user modifying an original version of a file, but fails to disclose a "conflict resolution pane which accepts user-generated textual modifications to the merged result." Hughes, col. 4, lines 25-26, lines 53-56. At most, Hughes describes a code inspection system in which "annotations to the new source code can be made." Hughes, col. 14, line 48. However, these annotations are not modifications to the source code, but are merely comments describing some aspect of the pre-existing code. Hughes, Figure 18. Applicants can find no disclosure or suggestion in Hughes of "a conflict resolution pane which accepts user-generated textual modifications to the merged result" as claimed.

Accordingly, for at least the reasons set forth above, claim 2 is patentably distinct from the cited references, both alone and in combination. Thus, Applicants kindly request withdrawal of this rejection.

In the 13th paragraph of the Office Action, Examiner rejects claim 11 under 35 USC § 103(a) as allegedly being unpatentable over Fontes in view of Percival in further view of U.S.

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Patent 6,407,753 B1 to Budinsky et al. ("Budinsky"). This rejection now is overcome in view of the amended claims.

As claim 11 depends from claim 1, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claim 11.

Budinsky fails to remedy deficient disclosure of Fontes and Percival. Rather, Budinsky is cited merely to show undoing selection and copying steps. Budinsky describes a system in which entities are merged according to user-defined rules to produce a "composite result". At best, Budinsky describes, "an editing session" in which "the user may perform many interactions, each of which specifies one or more new rules to be added to the rule set." Budinsky, col. 7, lines 1-3. This editing session does not constitute "user-generated textual modifications to the merged result." Rather, the modifications available to a user are limited to those provided by a graphical user interface (GUI). As described by Budinsky, "the illustrative GUI includes functions such as "Equate," "Rename," "Split" and "Delete". Budinsky, col. 6, lines 1-2. Furthermore, as described by Budinsky:

> It is to be appreciated that during the editing session, notwithstanding that
> each user-interaction appears to be directly editing or modifying the
> output result 13, what is actually occurring is that each user interaction is
> changing the underlying composition that is used by the MR
> [Matching/Reconciliation] engine 11 to derive the output result definitions
> 13 from the input definitions 12.

Budinsky, col. 6, lines 14-20. Hence, Budinsky only provides a user the ability to make modifications proposed by the system. Further, such modifications are not textual and, rather than modifying the merged result, only serve to modify the set of rules used to create the merged result. Hence, Applicants can find no disclosure or suggestion in Budinsky of "a conflict resolution pane which accepts user-generated textual modifications to the merged result" as claimed.

Accordingly, for at least the reasons set forth above, claim 11 is patentably distinct from the cited references, both alone and in combination. Thus, Applicants kindly request withdrawal of this rejection.

CONCLUSION

Applicants respectfully submit that claims 1-14, 16 and 18-21, as presented herein, are patentably distinguishable over the cited references (including references cited, but not applied). Therefore, Applicants request reconsideration and allowance of them.

In addition, Applicants respectfully invite Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully submitted,
Lawrence W. McVoy et al.

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By: /Brian G. Brannon/
Brian G. Brannon, Registration No. 57,219
Attorney for Applicants
Fenwick & West LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Tel.: (650) 335-7610
Fax: (650) 938-5200